



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

August 29, 2023

**By ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

## **MEMO ENDORSED**

Re: *NRDC v. EPA*, No. 16 Civ. 1251 (ER)

Dear Judge Ramos:

This Office represents defendant U.S. Environmental Protection Agency (“EPA”) in this action arising out of plaintiff Natural Resources Defense Council’s (“NRDC”) claim that EPA has failed to take certain perchlorate-related regulatory actions. I write respectfully to respect an 8-day extension of the Court’s deadline [Dkt. No. 94] for the parties to submit a joint status report on next steps in this matter, from August 31, 2023, to September 8, 2023. The extension is requested due to the absence of several EPA and U.S. Department of Justice attorneys who have been unavailable for consultation since the Court’s August 25, 2023 order, and the previously scheduled leave of the undersigned attorney until September 6, 2023. This is EPA’s first request for an extension of the status report deadline. Plaintiff NRDC consents to this request.

We thank the Court for its consideration of this request.

The request to extend the date to submit a joint status report, until September 8, 2023, is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.  
Dated: August 29, 2023  
New York, New York

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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cc: All Counsel of Record (via ECF)